

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA**

KYLE KEOGH, on behalf of himself and all
other similarly situated,

Plaintiff,

vs.

META PLATFORMS, INC.

Defendant.

**CONSENT MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT AND ESTABLISH
MOTION TO DISMISS BRIEFING
SCHEDULE**

Fed. R. Civ. P. 6(b); Local Civil Rule 6.01

Case No. 6:23-cv-5004-DCC

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Civ. Rule 6.01, Plaintiff Kyle Keogh ("Plaintiff"), by and through his counsel of record, hereby requests the Court for an Order extending the time for Meta to respond to Plaintiff's Complaint and establishing a motion to dismiss briefing schedule. In support of this motion, Plaintiff states the following:

1. Plaintiff filed the Complaint on October 5, 2023 (ECF No. 1).
2. Meta was served with the Complaint on October 6, 2023 (ECF No. 5).
3. Meta's deadline to respond to the Complaint is currently October 27, 2023.
4. No deadlines have previously been extended.
5. The parties agree there is good cause to extend Meta's time to respond to the Complaint and the parties' deadlines for briefing Meta's contemplated motion to dismiss given the factual and legal issues.
6. This motion is not made to delay or impede these proceedings.

7. The time to answer or otherwise respond to the Complaint has not passed.

8. In accordance with Local Rule 7.02, on October 18 and 19, 2023, counsel conferred with Meta's counsel via email regarding the proposed briefing schedule below. The parties agreed to this proposed briefing schedule.

9. Therefore, Plaintiff respectfully requests that the Court enter an order setting the briefing deadlines for Meta's contemplated Motion to Dismiss as follows:

Event	Deadline
Opening Motion to Dismiss Due	November 17, 2023
Opposition to Motion to Dismiss Due	December 8, 2023
Reply in Support of Motion to Dismiss Due	December 22, 2023

[SIGNATURES APPEAR ON FOLLOWING PAGE]

Dated: October 26, 2023

Respectfully Submitted,

By: /s/ Blake G. Abbott
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Blake G. Abbott (Fed ID #13354)
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on October 26, 2023, I electronically filed the foregoing CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT META PLATFORMS, INC. TO RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of Court using the CM/ECF system, which automatically provides electronic notice to all counsel of record.

By: /s/ Blake G. Abbott
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